

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re Flint Water Cases,

No. 5:16-cv-10444-JEL-MKM
(consolidated)

Hon. Judith E. Levy

Mag. Mona K. Majzoub

Walters, et al.,

Plaintiffs

v.

City of Flint, et al.,

Defendants

No. 5:17-cv-10164-JEL-MKM

STIPULATION REGARDING BELLWETHER SCHEDULE

Plaintiffs' Co-Liaison Counsel, Counsel for Veolia North America, LLC, Veolia North America, Inc., and Veolia Water North America Operating Services, LLC ("VNA"), and Lockwood Andrews and Newnam, P.C., Lockwood, Andrews and Newnam, Inc., and Leo A. Daly Company ("LAN Defendants"), hereby stipulate and agree to a one week extension of time for VNA and the LAN Defendants to file Motions for Summary Judgement and *Daubert* Motions and a corresponding one week extension for Plaintiffs' responses and Defendants' replies.

All other deadlines under the current Bellwether Schedule (ECF No. 1403) remain unchanged. A proposed Amended Bellwether Schedule is below.

Pursuant to ECF Rule 11(b), Plaintiffs request that a text-only order be entered granting this stipulation.

Dated: April 30, 2021

Respectfully submitted,

NAPOLI SHKOLNIK PLLC

By: /s/ Hunter Shkolnik
Hunter J. Shkolnik, Esq.
270 Munoz Rivera Avenue
Suite 201
Hato Rey, Puerto Rico 00918
(787) 493-5088
hunter@napolilaw.com

LEVY KONIGSBERG, LLP

By: /s/ Corey M. Stern
Corey M. Stern, Esq.
800 Third Avenue
Suite 11th Floor
New York, NY 10022
(212) 605-6200
cstern@levylaw.com

Co-Liaison Counsel for Individual Plaintiffs

**CAMPBELL, CONROY & O'NEIL
P.C.**

By: /s/ James M. Campbell
James M. Campbell
Alaina N. Devine
One Constitution Wharf, Suite 310
Boston, MA 02129
(617) 241-3000
jmcampbell@campbell-triallawyers.com
adevine@campbell-trial-lawyers.com

**BUSH SEYFERTH
PLLC**

By: /s/ Cheryl A. Bush
Cheryl A. Bush (P37031)
Michael R. Williams (P79827)
100 W. Big Beaver Road, Suite 400
Troy, MI 48084
(248) 822-7800
bush@bsplaw.com
williams@bsplaw.com

*Attorneys for Veolia North America,
LLC, Veolia North America, Inc.,
and Veolia Water North America
Operating Services, LLC*

By: /s/Wayne B. Mason

Wayne B. Mason (SBOT 13158950)
Travis S. Gamble (SBOT 00798195)
David C. Kent (SBOT 11316400)
S. Vance Wittie (SBOT 21832980)
FAEGRE DRINKER BIDDLE & REATH
LLP
1717 Main St., Suite 5400
Dallas TX 75201
(469) 227-8200
wayne.mason@faegredrinker.com
travis.gamble@faegredrinker.com
david.kent@faegredrinker.com
vance.wittie@faegredrinker.com

By: /s/Philip A. Erickson

Philip A. Erickson (P37081)
Robert G. Kamenec (P35283)
PLUNKETT COONEY
101 N. Washington Sq. Suite 1200
Lansing, MI 48933
(517) 324-5608
perickson@plunkettcooney.com
rkamenec@plunkettcooney.com

*Attorneys for Lockwood, Andrews &
Newnam, Inc., Lockwood, Andrews
& Newnam, P.C., and Leo A. Daly
Co.*

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2021, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing upon counsel of record.

Dated: April 30, 2021

/s/ Philip A. Erickson

AMENDED BELLWETHER SCHEDULE

New Date	Event
April 23, 2021	Last day to depose defendants' disclosed experts
May 11, 2021	Motions for Summary Judgment and Daubert Motions Filed
June 28, 2021	Responses to the motions for summary judgment and Daubert motions due
July 26, 2021	Motions in limine and designations of deposition testimony to be played/read to the jury due
August 2, 2021	Witness lists, exhibit lists, trial briefs, jury instructions and other similar pretrial filings required by the court
August 17, 2021	Replies to the opposition to motions for summary judgment and Daubert motions due
<i>August 2021 (Court's Convenience)</i>	<i>Hearing on Daubert Motions and Summary Judgment</i>
August 25, 2021	Oppositions to the motions in limine; counter-designations and objections to the designated testimony due
September 6, 2021	Objections and responses to the witness lists, exhibit lists, trial briefs, jury instructions and other similar pretrial filings required by the court due
September 15, 2021	Objections to the counter-designated deposition testimony due
<i>September, 2021 (Court's Convenience)</i>	<i>Hearing date for motions in limine and deposition designations; final Pre-Trial hearing regarding witness lists, exhibit lists, trial briefs, jury instructions, and other pretrial filings</i>
October 12, 2021	Trial Date